



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: April 10, 1984

US EPA RECORDS CENTER REGION 5



484707

TO: Division File

FROM: Perry Mann - Southern Region

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STATE OF ILLINOIS

SUBJECT: LPC 11780201 - Macoupin County - Brighton/Brighton Landfill #1
LPC 11780203 - Macoupin County - Brighton/Brighton Landfill #2 ILD000667139
Apparent violations under interim status observed on 3-22-84 at subject facility.

Section 722.111 - The owner/operator collects some of the runoff from the "active portion" of the facility, thereby generating a solid waste. He must then determine if this solid waste is hazardous using the methods prescribed in this section. Mr. Evans stated that no testing or analysis of the run-off has presently or previously been performed prior to its discharge. Discharge of the collected run-off is conducted by means of a four inch pump.

Section 725.113 - Waste analyses of hazardous wastes disposed of at the subject site are provided by the generators when applying for special waste permits. There is no information available on-site to indicate that these analyses are repeated as required under 725.113(a)(3). Harold Frank, the gate supervisor, stated that Gene Evans from time to time requests that samples be collected from a particular waste stream, but not on a regular basis. The sampling protocol is not documented in any way. Mr. Frank stated that he was not sure what happened to the sample after it was collected nor was he certain whether the samples were in fact analyzed. Wastes are inspected prior to being disposed; however, according to Mr. Frank some of the hazardous wastes, particularly those coming from Shell are very difficult to identify and match with the appropriate manifests. Gene Evans, who is responsible for the identification of the hazardous wastes, was unable to identify waste observed exposed on-site in the company of Pat McCarthy during on-site inspection. The owner/operator is unable to identify the wastes satisfactorily as required under 725.113(a)(4). The owner/operator does not have a written waste analysis plan at the facility as required under 725.113(b), nor does the facility specify those procedures required of off-site facilities as required under 725.113(c).

Section 725.114(b)(2)(A) - The owner/operator has not provided an artificial or natural barrier which completely surrounds the active portion of the facility. The owner/operator does not consider his entire facility as the active portion, although no part of the facility is closed. He therefore has a portion of the site partially fenced. No gates were provided on this "interior fence". Also, the entire facility (active portion) does not have a complete perimeter fence. Section 725.114(c) - Only one sign is posted on-site. It is located at one of the unrestricted entrances to a part of the active portion.

Section 725.115 - The owner/operator does not have a written schedule for conducting inspections at the facility as required under 725.115(b)(1) and (b)(2). Harold Frank indicated that daily inspections are made on days when operating. (See Inspection Log example attached.) A review of the inspection log file on-site determined that the last inspection was conducted on March 1, 1984. When questioned as to why no inspections have been done since that date, Mr. Frank stated that he did not conduct any inspections because he knew he "had problems". The failure to conduct any inspections since that date to the subject inspection date is an apparent violation of 725.115(a).

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Section 725.116 - A one time training seminar was held on May 22, 1981 for the Brighton Landfill employees. The seminar was given by Ryckman's Emergency Action and Consulting Team, Inc. Of the three participants of this training seminar, only one (Gene Evans, the owner/operator) is still employed at the Brighton Landfill. No other training seminars for the current personnel have been provided. Harold Frank, who is considered to be the Emergency Coordinator currently has not participated in a seminar such as that held on May 22, 1981. No personnel records were available for review on-site. The subject facility is in apparent violation of Section 725.116a. thru e.

Section 725.137 - With the exception of arrangement being made with Alton Memorial Hospital, the owner/operator has not documented whether any attempts were made to enter into arrangements with police, fire departments, emergency response teams, etc. as required under Section 725.137a and b.

Section 725.152 - The contingency plan maintained on site does not describe the actions personnel must take, as required under 725.152a, in the event of explosions or any unplanned sudden or non-sudden releases of hazardous wastes. (The plan does describe actions to be taken in case of a fire.) The plan does not describe any arrangements made with local police departments, fire departments, etc. (with the exception of Alton Memorial Hospital) as required under 725.152c. The plan on-site contains the name and phone number of Don Thorton, who is identified as the Emergency Coordinator in the plan; but he no longer works for the Brighton Landfill. Harold Frank identified himself as the new Emergency Coordinator, but is not described as such in the plan on-site currently as required under 725.152d.

Section 725.153 - As discussed previously with the exception of arrangements and a copy of the plan provided to Alton Memorial Hospital, copies of the contingency plan have not been submitted to the other necessary parties as required under 725.153b.

Section 725.155 - Harold Frank has not undergone any training nor do any records provide information demonstrating that he is familiar with the plan and the characteristics of wastes handled as required.

Section 725.173 - The owner/operator does not maintain an operating record in which the required information is to be documented as required under this Section. Some information is maintained on-site, but is not documented or contained in an operating record.

Section 725.211 - The closure plan on-site does not demonstrate how the owner/operator plans to close the facility in a manner as described under this Section.

Section 725.212 - The closure plan on-site does not include any of the specific requirements listed under 725.212a.1 thru 4 as required.

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Section 725.242 - The regulations require that the cost estimate be based on the possibility that operations may cease unexpectedly which would cause the closure at some point in the facility life to be the most expensive. There is no documentation provided by the owner/operator that the closure cost estimate of \$69,296 (as per 1983 Annual Report) is based on the above described requirement, under 725.242a. This closure cost estimate seems to be very low. Information provided by a federal guidance manual on closure and post-closure estimates indicates that the closure costs necessary to cover the 16.71 acres with only a 24 inch clay layer would be approximately \$608,000 using the most conservative cost factors given in the manual. (i.e. an off-site cover supply within 2 miles of the site at \$6.00 per cubic yard of clayey material.) Closure requirements under interim status require that a synthetic liner be also utilized in combination with a clay liner. A conservative cost for placing a PVC (the least expensive) liner over the 16.71 acres obtained from the aforementioned manual would be approximately \$134,000. This cost does not include the costs for the installation of a stability layer beneath the PVC or a protective layer of cover material above the PVC. The information seems to indicate that the closure cost estimate is inaccurate.

725.402a - The owner/operator does not divert run-on away from the active portions of the site. No area of run-on onto the site from off-site was observed; however, no effort was made to divert run-on away from the exposed waste on-site.

725.402b - All run-off from the active portions of the landfill is not collected. Part of the northern and southern portions of the site, and all of the western portion drains to the excavated area on-site. A four inch pump is located near the southern boundary in the excavation. Mr. Evans stated that they do pump off-site as needed without doing any testing to determine if the runoff is a hazardous waste. On this date the pump was not running, but there was a point source discharge off-site by gravity flow.

Section 725.409 - The owner/operator does not maintain in an operating record the specific items stated as required under 725.409a and b.

Section 725.410 - The owner/operator does not have a closure plan on-site containing the specific items as required under 725.410a thru c.

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cc: Southern Region

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